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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 TASTY ONE, LLC d/b/a EARTH SMARTE
12 WATER OF LAS VEGAS, Foreign Limited-
13 Liability Company;

14 Plaintiff/Counter-Defendant,
vs.

15 EARTH SMARTE WATER, LLC d/b/a
16 DENCOH20, LLC, an Arizona company; DOES
17 I through X; and ROE CORPORATIONS I
through X, inclusive,

18 Defendant/Counter-Claimant.

Case No.: 2:20-cv-01625-APG-NJK

**STIPULATION TO EXTEND THE
DEADLINE TO FILE RESPONSE TO
DEFENDANT'S MOTION TO REOPEN
DISCOVERY [ECF NO. 99]**

20 **(First Request)**

21 IT IS HEREBY STIPULATED AND AGREED, by and between the parties, plaintiff Tasty
22 One, LLC d/b/a Earth Smarte Water of Las Vegas ("Plaintiff"), by and through its attorneys of record,
23 the law firm MAIER GUTIERREZ & ASSOCIATES and defendant Earth Smarte Water, LLC d/b/a
24 DENCOH20 ("Defendant"), by and through its attorney of record, John P. Aldrich, Esq., of the
25 Aldrich Law firm, Ltd., as follows:

26 On November 22, 2022 Defendant filed its Motion to Reopen Discovery [ECF No. 99] and
27 Motion to De-designate Documents Disclosed by Plaintiff and Marked as "Highly Confidential-
28 Attorney's Eyes Only" Pursuant to Protective Order and for a Declaration that the "Highly

1 Confidential-Attorney's Eyes Only" Designation Does Not Apply [ECF No. 100]. The current
2 deadline to respond to these motions is December 2, 2022.

3 Because of existing commitments and previously scheduled holiday travel for the
4 Thanksgiving and Christmas holidays of Plaintiff's counsel, the parties have agreed to amend the
5 briefing schedule as follows: Plaintiff's Responses to [ECF No. 99] and [ECF No. 100] shall be due
6 on or before December 16, 2022 and Defendant's Replies in support of [ECF No. 99] and [ECF No.
7 100] shall be due on or before December 30, 2022.

8 This stipulation is submitted in good faith and not for purposes of delay. It is the first request
9 for an extension of these deadlines and the fourth request for an extension of any deadline in this case.
10 The bench trial in this matter is currently scheduled on June 23, 2023 at 9:00am. A settlement
11 conference is currently scheduled in this matter on April 4, 2023 at 10:00am. This stipulation does
12 not in any way interfere with or cause a delay in these existing deadlines.

13 IT IS SO STIPULATED.

14 DATED this 22nd day of November 2022.

DATED this 22nd day of November 2022.

15 **MAIER GUTIERREZ & ASSOCIATES**

ALDRICH LAW FIRM, LTD.

16 /s/ *Jean Paul Hendricks*

/s/ *John P. Aldrich*

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23 *Attorneys for
Defendants/Counterclaimants/Third-Party
Plaintiffs Earth Smarte Water, LLC d/b/a
DENCOH20, LLC*

24 **ORDER**

25 IT IS SO ORDERED this 23rd day of November, 2022.

26 
27 UNITED STATES MAGISTRATE JUDGE
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